

**Vermont Department of Environmental Conservation  
Drinking Water and Groundwater Protection Division**

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*Agency of Natural Resources*

November 20, 2020

Randolph Fire District #1  
Attn: John Lens, Prudential Committee Chair  
P.O. Box 314  
Randolph Center, VT 05061

Vermont Technical College  
Attn: Theodore Manazir, Facilities Director  
P.O. Box 500  
Randolph Center, VT 05061

Re: Sanitary Survey, Randolph Center Water System, Public Community Water System, Randolph, VT WSID # 5177

Mr. Lens and Mr. Manazir,

A sanitary survey of the Randolph Center Water System (Water System) was conducted on October 22, 2020. Joshua Lochhead and I represented the Vermont Department of Environmental Conservation, Drinking Water and Groundwater Protection Division (Division); the both of you and Patricia Beavers, Water System Operator, represented the Water System.

During the sanitary survey and associated file review the following significant deficiencies were identified and need to be corrected:

- 1. A Permit to Operate Application is Required:** Under Subchapter 21-5, Section 5.1 of the Vermont Water Supply Rule (Rule), *“No person shall conduct, control, manage, operate or maintain a **Public** water system without first receiving from the Secretary an operating permit or a temporary operating permit.”* Additionally, under Subchapter 21-5, Section 5.3.1 of the Rule, *“Application for an operating permit shall be submitted to the Secretary, signed by the owner and shall contain such information as may be requested by the Secretary to enable him or her to determine whether the facility and its operation will comply with this rule...”* The Water System’s most recent Permit to Operate (PTO) expired on March 1, 2015. As described in a May 10, 2017, letter to the Water System from the Division, the Division understands that the Water System is jointly owned by Vermont Technical College (VTC) and the Randolph Fire District #1 (RFD1), and requires that VTC and RFD1 submit a jointly signed PTO application. VTC and RFD1 did submit a jointly signed PTO application to the Division on February 8, 2018; however, the application cannot be processed as submitted. **On or before February 1, 2021**, the Division requests that the Water System submit a new PTO application that is jointly signed by the RFD1 and VTC. Please note that the RFD1 signature must be from a prudential committee member. The VTC signature must be from one of the Principals as listed with the Vermont Secretary of State (SOS) Corporations Division. Currently VTC does not have any Principals listed with the SOS Corporations Division. Since VTC itself is owned by Vermont State Colleges, any of the 15 people listed as a Principal of Vermont State Colleges with the SOS Corporations Page may sign the application or may submit a letter to the Division granting signing authority for anything pertaining to the Water System to another person. The list of Principals for Vermont State Colleges can be found at the following web address: <https://bizfilings.vermont.gov/online/BusinessInquire/Principals?businessID=45454>. A PTO application is included with this letter.
- 2. Inadequate Disinfection Monitoring, TP001:** Under Chapter 21, Appendix A, Part 4.3.4(b) of the Rule, *“Each system shall continuously monitor the disinfectant residual of the water as it enters the distribution system and record the lowest disinfectant residual each day...”* The Water System is currently reporting the residual disinfectant levels for TP001 (Spring Treatment Facility) from a location that is not at, or before, the first service connection and after disinfection contact time (CT).

It is reported that the Water Systems utilizes approximately 1,300' of 6-inch distribution pipe prior to the first service connection for CT. **On or before February 1, 2021**, the Water System must either identify the first connection served by TP001 and begin recording daily disinfectant residual concentrations at the first service connection or, submit a plan and schedule to install a dedicated sampling hydrant prior to the first service connection and after disinfection CT for Division review and approval.

During the sanitary survey and associated file review the following minor deficiency was identified and needs to be corrected:

- 3. Inadequate Spring Overflow:** Under Chapter 21, Appendix A, Part 3.3.2.1.2 of the Rule, "*Spring and shallow well site construction shall include the following: (a) accessible entrance with lock, (b) screened openings, (c) runoff diversion berm located 50 feet upslope where feasible, (d) back fill material of high clay content sloping away from the structure, (e) minimum of 4 inches of top soil over the clay, and (f) a watertight sanitary cover.*" During the sanitary survey it was observed that the screen on the overflow pipe for WL001 (Spring) was damaged. **On or before January 1, 2021**, the Division requests that the Water System replace the screen on the overflow pipe for WL001 and submit photographic documentation of the repair to the Division.

The following are provided for the Water System's review, consideration, and comment:

- 4. Officials Contact Form:** To be sure that each co-permittee receives all correspondence regarding the Water System, the Division requests that the Water System submit a new jointly signed Officials Contact Form (OCF). Due to the limitations of the Division's database for Water System contacts and the unique ownership situation of the Randolph Center Water System and in order to be sure that each co-permittee receives all Water System correspondence from the Division going forward, the Division recommends that Mr. Manazir be listed as the Designated Operator, Ms. Beavers be listed as an additional operator, and Mr. Lens/the RFD1 be listed as the Administrative Contact. Please be aware that the signature requirement for the OCF are the same as described in item #1 above. A OCF is included with this letter.
- 5. Construction Permit Closeout, C-3353-16.0:** Permit to Construct (PTC) #C-3353-16.0 was issued by the Division to the Water System on May 3, 2017 and authorized modifications to the Water System to allow for the connection of the new State of Vermont Laboratory. PTC #C-3353-16.0 required certain conditions to be met within 60 days of construction completion. During the sanitary survey it was observed that the laboratory is connected to the Water System and is in use. Please immediately submit all closeout documentation as required by the PTC to the Division's FTP site. FTP site instructions are included with this letter.
- 6. Memorandum of Understanding (MOU):** Due to the unique nature of the dual ownership of the Water System, the Division highly encourages the two owners (RFD1 and VTC) to develop an MOU between the two entities. Some items that the MOU may address are who owns what infrastructure, what each respective owner is responsible for, who pays for what (sampling, repairs, contingency/planning). These are just a few examples of what an MOU addresses. Ultimately the MOU is a document that both owners must be comfortable with and addresses items that will allow the dual ownership of the Water System to move forward in a smooth manner. Once the co-owners of the Water System establish an executed MOU, the MOU should be provided to the Division to be included in the Division's file for the Water System.

The Division requests that the Water System provide a written response to the items above by **December 21, 2020**. The written response should indicate that the compliance dates above are acceptable or provide an alternative date for review and approval. In the absence of a written response as requested, the Division may incorporate the above compliance schedule in the Water System's next PTO.

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I appreciate the two of you and Patricia meeting with us in order to conduct the sanitary survey of the Randolph Center Water System. I look forward to working with you in the future. If you have any questions or would like to discuss anything regarding the survey, please feel free to contact me at the address above, by email at [matthew.caldwell@vermont.gov](mailto:matthew.caldwell@vermont.gov), or by phone at 802-522-6409.

Sincerely,



Matthew P. Caldwell  
System Operations Specialist

C: Patricia Beavers, Water System Operator, WSID 5177  
Dana Nagy, Community Operations Section Supervisor, DWGWPD  
Ben Montross, Senior Environmental Program Manager, DWGWPD  
Jeff Girard, Compliance Section Supervisor, DWGWPD  
Joshua Lochhead, Capacity Specialist, DWGWPD  
Beth Bannar, Environmental Technician, DWGWPD  
WSID File 5177

Enc: PTO Application, OCF, FTP Site Instructions